

**Floyd, Jonathan P.**

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**From:** Floyd, Jonathan P.  
**Sent:** Friday, February 03, 2017 10:56 AM  
**To:** 'Ahmad Keshavarz'  
**Cc:** Jessica Moody; Manning, Jason E.; Genovese, Amanda Lyn  
**Subject:** RE: PRA ads. Young

Mr. Keshavarz,

We believe that this is a very reasonable request on our behalf given that Judge Levy has twice ordered that it be produced. The Judge's Order does not direct you to produce "any" retainer agreement that meets certain requirements but rather requires the production of **"the current retainer agreement between plaintiff and counsel."**

Please produce the current retainer agreement between Ms. Young and your law firm.

JPF

**Jonathan P. Floyd**  
TROUTMAN SANDERS LLP  
804.697.1435 (direct) | 804.697.1339 (fax)

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**From:** Ahmad Keshavarz [<mailto:ahmad@newyorkconsumerattorney.com>]  
**Sent:** Friday, February 03, 2017 10:49 AM  
**To:** Floyd, Jonathan P.  
**Cc:** Jessica Moody; Manning, Jason E.; Genovese, Amanda Lyn  
**Subject:** Re: PRA ads. Young

The order states:

**plaintiff's counsel is directed to produce "the current retainer agreement between plaintiff and counsel limited to fee splitting and plaintiff's counsel's role in approving a settlement,"**

As I indicated in an email months ago, there are no documents responsive to this request.

Ahmad Keshavarz

On Feb 3, 2017, at 10:44 AM, Floyd, Jonathan P. <[Jonathan.Floyd@troutmansanders.com](mailto:Jonathan.Floyd@troutmansanders.com)> wrote:

Mr. Keshavarz,

Please see the attached.

Pursuant to the Court's Orders of November 15, 2016 and February 1, 2017, please produce your retainer agreement today.

JPF

**Jonathan P. Floyd**  
TROUTMAN SANDERS LLP  
804.697.1435 (direct) | 804.697.1339 (fax) | 1001 Haxall Point | Richmond, VA 23219

[Email](#)   [LinkedIn](#)   [Web](#)

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<2017-02-03 Fourth Amended Notice of Deposition (Susan Young).pdf>

<2017-02-03 Notice of Deposition (Kevin Garrett).pdf>